

# EXHIBIT 31.1



## WHO WE ARE

For more than 20 years, Stueve Siegel Hanson has achieved exceptional litigation results through an unconventional business model for law firms: Our payment for legal services depends entirely on the results we achieve.

Through this approach, we have recovered billions of dollars in damages and relief for consumers, entrepreneurs, employees, farmers, small and large businesses, and a variety of economic underdogs.

The cases we handle address some of the most complex areas of the law, including antitrust, intellectual property, Fair Labor Standards Act collective actions, consumer and securities class actions, cybersecurity, franchise disputes and other complex business litigation.

Our team of lawyers includes some of the best-trained and most experienced trial lawyers in the country. Stueve Siegel Hanson's founders were partners at some of the nation's largest law firms; they are joined by attorneys trained at top law schools, prominent corporate firms and judicial clerkships. Together, we share a drive to level the playing field in litigation and work toward justice for all.

We are honored to have been recognized as a repeat *Law360* Practice Group of the Year, among the *National Law Journal's* Elite Trial Lawyers, and as *Chambers USA* Leading Lawyers – but we are equally proud to be recognized for our contributions to the profession outside the courtroom.

Of our investment in diverse law and journalism students, *Missouri Lawyers Weekly* wrote: "Any firm can talk about promoting DEI, but Stueve Siegel Hanson has put its money where its mouth is when it comes to creating a more equitable environment."

## OUR MISSION

Stueve Siegel Hanson provides aggressive, cutting-edge representation in litigation. Our law firm serves companies in business disputes as well as individuals harmed by dangerous products, unfair employers or unsavory business practices.

Because we work on a contingency model, our fees are based on the results we achieve. This means our trial lawyers have the same interests you do: Succeed for you and we succeed ourselves, fail you and we fail ourselves.

We believe the pursuit of justice should not be subject to the dysfunction of the billable hour, which rewards attorneys more for time than the results achieved. We take pride in winning efficiently and effectively as our clients' partner in the courtroom.

We invest in our firm, our profession and our community. We recruit the brightest attorneys from the nation's top law firms, and together we maintain a culture of camaraderie and respect. We apply new technology to further our efficiency, communication and creativity. We give our time and talents to pro bono projects, community service and bar organizations. While we take considerable pride in earning awards and recognition, we are most fulfilled by results, referrals and repeat business.

## JUDICIAL PRAISE

"I've always been impressed with the professionalism and the quality of work that has been done in this case by both the plaintiffs and the defendants. On more than one occasion, it has made it difficult for the Court because the work has been so good."

**Hon. Nanette Laughrey**

U.S. District Court for the Western District of Missouri

*Nobles, et al., v. State Farm Mutual Automobile Insurance Co.*

"The complex and difficult nature of this litigation, which spanned across multiple jurisdictions and which involved multiple types of plaintiffs and claims, required a great deal of skill from plaintiffs' counsel, including because they were opposed by excellent attorneys retained by Syngenta. That high standard was met in this case, as the Court finds that the most prominent and productive plaintiffs' counsel in this litigation were very experienced had very good reputations, were excellent attorneys, and performed excellent work. In appointing lead counsel, the various courts made sure that plaintiffs would have the very best representation...

In this Court's view, the work performed by plaintiffs' counsel was consistently excellent, as evidenced at least in part by plaintiffs' significant victories with respect to dispositive motion practice, class certification, and trial."

**Hon. John Lungstrum**

U.S. District Court for the District of Kansas

*In Re: Syngenta AG MIR 162 Corn Litigation*

"The most compelling evidence of the qualifications and dedication of proposed class counsel is their work in this case. Considering how far this action has come despite a grant of summary judgment in Defendant's favor and a reversal on appeal, proposed class counsel have made a strong showing of their commitment to helping the class vigorously prosecute this case."

**Hon. Andrew J. Guilford**

U.S. District Court for the Central District of California

*Reyes v. Experian*

"I believe this was an extremely difficult case. I also believe that it was an extremely hard fought case, but I don't mean hard fought in any negative sense. I think that counsel for both sides of the case did an excellent job...

I congratulate the plaintiffs and I also congratulate the defense lawyers on the very, very fine job that both sides did in a case that did indeed pose novel and difficult issues."

**Hon. Audrey G. Fleissig**

U.S. District Court for the Eastern District of Missouri  
*William Perrin, et al., v. Papa John's International, Inc.*

"The experience, reputation and ability of class counsel is outstanding."

**Hon. Michael Manners**

Circuit Court of Jackson County, Missouri  
*Berry v. Volkswagen Grp. of Am., Inc.*

"It appears that plaintiffs' counsel's experience in wage-hour class actions has unmatched depth."

**Hon. J. Thomas Marten**

U.S. District Court for the District of Kansas  
*Garcia v. Tyson Foods, Inc.*

## CLASS AND COLLECTIVE ACTIONS

Since opening its doors in 2001, Stueve Siegel Hanson has obtained substantial results in a wide range of complex commercial, class, and collective actions while serving as lead or co-lead counsel.

Over the past decade, verdicts and settlements include:

### ***Antitrust***

- Obtaining \$53 million in settlements between a class of direct purchasers of automotive lighting products and several manufacturers accused of participating in a price fixing scheme.
- Obtaining a \$25 million settlement in a nationwide antitrust class action regarding price fixing of aftermarket automotive sheet metal parts.
- Obtaining a \$7.25 billion settlement in a massive price-fixing case brought by a class of U.S. merchants against Visa, Mastercard and their member banks.
- Obtaining \$33 million in nationwide class action alleging price fixing for certain polyurethanes in Urethanes antitrust case.
- Obtaining a \$25 million settlement in a class action lawsuit that alleged Blue Rhino and certain competitors conspired to reduce the amount of propane gas in cylinders sold to customers. The firm obtained a \$10 million settlement in a related suit against AmeriGas.

### ***Data Privacy***

- Obtaining a historic \$1.5 billion settlement in a nationwide class action stemming from credit reporting firm Equifax's massive 2017 data breach.
- Obtaining \$500 million, plus additional benefits, for victims of the T-Mobile data breach.
- Obtaining a \$190 million settlement in a class action following a Capital One data breach that compromised the confidential information of nearly 100 million credit applicants.
- Obtaining a \$115 million settlement resulting from a 2015 data breach affecting Anthem, Inc., one of the nation's largest for-profit managed health care companies.
- Obtaining a \$38 million settlement with Meta relating to alleged insufficient disclosures of location-tracking practices in the Facebook application.
- Obtaining two settlements totaling \$29 million to resolve consumer class action claims against Experian, one of the "big three" credit reporting agencies, arising out of the company's reporting of delinquent loan accounts.
- Obtaining a \$10 million settlement in a class action resulting from a data breach at Target Corp.
- Obtaining a \$3.25 million settlement in data privacy litigation on behalf of more than 61,000 optometrists whose personal information was compromised by the national optometry board.
- Obtaining a \$2.3 million settlement in a class action stemming from a data breach at global technology company Citrix's internal network.
- Obtaining a \$1.3 million settlement on behalf of 7,000 employees of litigation services provider UnitedLex following a data breach resulting in extensive tax fraud.

### ***Commercial Litigation***

- Obtaining a \$1.51 billion settlement – the largest agribusiness settlement in U.S. history – for U.S. corn growers, grain handling facilities and ethanol production plants that purchased corn seeds prematurely sold by Syngenta.
- Obtaining a \$218 million jury verdict for a class of Kansas corn producers who purchased corn seeds prematurely sold by Syngenta.
- Obtaining a \$56 million settlement on behalf of a class of government entities against Trinity Industries and its manufacturing arm, Trinity Highway Products, to remove and replace the companies' 4-inch ET Plus guardrail end terminals on Missouri roads.
- Obtaining a \$55 million settlement for U.S. dairy farmers who purchased the Classic model of the voluntary milking system (VMS) manufactured and sold by DeLaval Inc.
- Obtaining a \$49.75 million settlement in the United States with Lely on behalf of dairy farmers who purchased its robotic milking system, the Lely Astronaut A4.
- Obtaining more than \$44 million in restitution and \$7.9 million in cash for dentists against Align Technology, Inc. in a nationwide deceptive trade practices case.

### ***Consumer Class Action***

- Obtaining up to \$220 million in damages for all Missouri residents who purchased the prescription pain reliever Vioxx before it was removed from the market.
- Obtaining more than \$75 million in relief for purchasers of Hyundai vehicles for Hyundai's overstatement of horsepower in vehicles.
- Obtaining \$29.5 million in settlements for overdraft fees charged to customers from UMB Bank, Bank of Oklahoma and Intrust Bank.
- Obtaining \$19.4 million for purchasers of H&R Block's Express IRA product related to allegedly false representations made during the sales presentation.

### ***Cost of Insurance***

- Obtaining a \$2.25 billion settlement in a class action lawsuit against The Lincoln National Life Insurance Company over alleged life insurance policy overcharges.
- Obtaining a \$325 million settlement in a nationwide class action against State Farm on behalf of policy owners alleging the insurer improperly included non-mortality factors in calculating the cost of insurance charge under the insurance contract.
- Obtaining a \$59.75 million settlement in a nationwide class action lawsuit against John Hancock Life Insurance Company (U.S.A.) over alleged life insurance policy overcharges.
- Obtaining a \$34 million jury verdict in a class action trial against State Farm Insurance regarding alleged life insurance policy overcharges.
- Obtaining three jury verdicts totaling nearly \$33.5 million against Kansas City Life on behalf of Missouri and Kansas policy owners over alleged universal life insurance policy overcharges.



### ***Wage and Hour***

- Obtaining a \$73 million settlement on behalf of current and former Bank of America retail banking and call center employees who alleged violations of the Fair Labor Standards Act.
- Obtaining approximately \$50 million in settlements on behalf of DirecTV satellite technicians who were denied overtime and minimum wages in a California state court class action, more than 50 federal mass actions, and a collective arbitration.
- Obtaining a \$27.5 million settlement for a class of loan originators who were misclassified as exempt and denied overtime.
- Obtaining a \$25 million settlement for a class of mortgage consultants for unpaid overtime as lead counsel in multidistrict litigation.
- Obtaining a \$24 million settlement to resolve a collective arbitration and more than 50 federal mass actions involving misclassified satellite technicians denied overtime and minimum wages.
- Obtaining a \$14.5 million settlement for a class of inventory associates for unpaid overtime.
- Obtaining a \$12.5 million settlement for multiple classes and collective of pizza delivery drivers alleging vehicle expenses reduced their wages below the minimum wage.
- Obtaining a \$12.5 million settlement for classes of workers at two MGM casinos for tip credit violations.
- Obtaining a \$10.5 million settlement for a class of bank employees for misclassification as being exempt from overtime.
- Obtaining a \$9.8 million settlement for collectives of workers at three Rush Street Gaming casinos for tip credit and wage deduction violations.
- Obtaining an \$8.5 million settlement for a collective of employees in the hospitality industry for unpaid minimum wages.
- Obtaining a \$7.7 million settlement for a class of loan account servicers misclassified as exempt and denied overtime.
- Obtaining a \$7.5 million settlement for class of loan processors in multidistrict litigation.
- Obtaining \$6 million settlement for a class of workers at Wind Creek Casino for tip credit and wage deduction violations.
- Obtaining a \$5.5 million settlement for a class of workers at Rivers Casino Schenectady for tip credit and overtime violations.
- Obtaining dozens of settlements between \$1 million and \$5 million for classes and collectives seeking unpaid overtime and minimum wages.

## NORMAN E. SIEGEL

### PARTNER



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Norman E. Siegel litigates high-stakes cases for companies and individuals. He has earned a reputation locally and nationally for his ability to strategize, negotiate and deliver results. He was recently named by *Best Lawyers* as a 2020 “Lawyer of the Year” and by *Law360* as a “Titan of the Plaintiff’s Bar” for his work in class action litigation following big wins against some of the largest corporations in America.

Norm has successfully tried to verdict a wide range of cases, obtaining several multimillion-dollar jury verdicts, and has obtained billions in settlements for his clients.

Norm concentrates his practice in three principal areas:

**Business Litigation.** Norm successfully deploys the firm’s contingency fee business litigation model in bet-the-company and “David vs. Goliath” matters involving intellectual property, breach of contract, fraud, misrepresentation and more. In one such matter, he prosecuted a groundbreaking antitrust case on behalf of Heartland Surgical Specialty Hospital, which claimed the region’s dominant hospital systems conspired to prevent it from obtaining in-network provider contracts. After Norm secured a key admission from a defense witness, Heartland settled with all defendants.

**Data Breach and Privacy.** Named one of Law360’s “MVPs of the Year” for Cybersecurity and Privacy, Norm has served as lead counsel in several of the largest data breach cases litigated to date, including the sprawling multidistrict litigation alleging Equifax compromised the personal information of more than 148 million Americans in a 2017 data breach. More than 250 cases were filed against Equifax, and Norm was selected lead counsel over scores of other applicants. A leader in this burgeoning field of law, Norm has prosecuted data breach claims against Capital One, Quest Diagnostics, Target Corp., The Home Depot Inc., Marriott, the Office of Personnel Management, and the National Board of Examiners in Optometry, and he is the co-founder of the American Association for Justice’s data breach and privacy group.

**Class Actions.** Norm’s recent work includes multimillion-dollar jury verdicts and settlements on behalf of consumers who were overcharged for life insurance policies. In *Vogt v. State Farm Insurance Co.*, Norm delivered the closing argument to the jury that

returned a \$34 million verdict for Missouri owners of State Farm life insurance. Norm also served as lead counsel in *Larson v. John Hancock Life Insurance Co.*, a nationwide class action that ultimately settled for \$59.75 million just before trial. For his work in the field, *Best Lawyers* recently named Norm “Lawyer of the Year” for class action litigation.

Norm began his career as an Assistant Attorney General at the Missouri Attorney General’s Office, where he gained a broad range of experience in complex litigation. He was later named partner at the firm now known as Dentons before starting Stueve Siegel Hanson in 2001.

Norm was recognized as a 2020 Missouri Lawyers Awards Influential Lawyer by *Missouri Lawyers Weekly*; has been named among the “500 Leading Plaintiffs’ Lawyers in America” by Lawdragon; and is listed among *Best Lawyers in America* and *Kansas City Business Journal’s* “Best of the Bar.” He has been honored several times as a Top 100 Missouri/Kansas “Super Lawyer” and a Benchmark Plaintiffs “Local Litigation Star.”

Norm has served on the boards of the Healthcare Foundation of Greater Kansas City, the Kansas City Bar Foundation and the Negro Leagues Baseball Museum. Outside the office, he enjoys tennis, collecting art, and spending time with his family and his dog, a Whoodle named Lucky.

## **EDUCATION**

### **Washington University School of Law, J.D.**

- Law Journal: Washington University Journal of Urban Contemporary Law, Articles Editor

### **Tufts University, B.A.**

- Major: Political Science

## **HONORS & RECOGNITIONS**

Chambers USA Band 1, Litigation: Mostly Plaintiffs - Missouri

Best Lawyers in America - Bet-the-Company Litigation (2025); Commercial Litigation (2014-present); Mass Tort Litigation/Class Action-Plaintiffs (2016-present); Consumer Protection Law (2017-present); Privacy and Data Security Law (2021-present)

Best Lawyers in America 2020 Mass Tort Litigation/Class Actions - Plaintiffs "Lawyer of the Year" in Kansas City, Mo.

Law360 2023 MVP of the Year, Class Action

Law360 2020 Titans of the Plaintiffs Bar

Law360 2019 MVP of the Year, Cybersecurity & Privacy

Law360 2019 Practice Group of the Year, Cybersecurity & Privacy

Missouri Lawyers Weekly The POWER List: Commercial and Consumer Law (2020-2022, 2024)

Missouri Lawyers Weekly The Top 100 POWER List: Commercial and Consumer Law (2022)

Missouri Lawyers Weekly 2020 Missouri Lawyers Awards, Influential Lawyer

Missouri & Kansas *Super Lawyers*, 2006-present

- Top 100: Missouri & Kansas Super Lawyers: 2013, 2016-2021
- Top 50: Kansas City Super Lawyers: 2017
- Top 50: Kanas City Business: 2014

Kansas City Business Journal Best of the Bar

AmLaw Litigation Daily Litigator of the Week

Lawdragon Magazine 500 Leading Plaintiffs' Lawyers in America

Benchmark Plaintiffs Local Litigation Star for the State of Missouri (2013-2015)

AV Preeminent® Peer Review Rated - Martindale Hubbell

## COMMUNITY & PROFESSIONAL

Former Chairman of the Board, Healthcare Foundation of Greater Kansas City. In 2005, Attorney General Jay Nixon appointed Norm to serve on the Community Advisory Committee of the \$450 million Healthcare Foundation of Greater Kansas City. Norm served as Chair of the CAC before being elected to the Board of Directors of the Foundation in 2008. Norm served as Vice-Chairman and in 2009 was elected to serve as Chairman of the Board.

- Board Member, Kansas City Metropolitan Bar Foundation
- Cy Pres Committee, Legal Aid of Western Missouri
- Rule 45 Subcommittee, Federal Rules Committee

## J. AUSTIN MOORE

### PARTNER



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Austin Moore litigates high-stakes cases. He practices in state and federal courts across the country and regularly takes on major corporations in nationwide class actions. Over the last decade, Austin has recovered hundreds of millions of dollars for consumers and victims of personal injuries.

The *National Law Journal* recently selected Austin as one of the "Rising Stars of the Plaintiff Bar" in its 2023 Elite Trial Lawyers Awards. Austin has also been recognized by *Law360* as one of the "Top Attorneys Under 40" in the country, named a "Rising Star" in class action law by *Super Lawyers*, and honored as an "Up and Coming Lawyer" by *Missouri Lawyers Weekly*.

Austin focuses his practice on three primary practice areas:

**Data Breach and Privacy Litigation.** Austin is a national leader in data breach and privacy cases. He has played key roles representing consumers in many of the nation's largest data breach class actions, including lawsuits against T-Mobile, Target, the Home Depot, Anthem Insurance, Equifax, and Marriott. Austin's recent successes include:

- Co-lead counsel in \$2.3 million settlement on behalf of employees of Citrix
- Co-lead counsel in \$3.25 million settlement on behalf of optometrists
- Member of leadership teams that achieved the historic \$1.5 billion Equifax settlement and \$500 million T-Mobile data breach settlement

Austin has also served as appellate counsel in multiple precedent-setting data breach cases addressing Article III injury. He is the past president of the Data Breach and Privacy section of the American Association for Justice and currently serves as a member of the Sedona Conference working groups on Data Security and Privacy Liability and HIPAA.

**Consumer Class Actions.** Austin represents consumers and employees who have been harmed by corporate misconduct, including false advertising, deceptive practices, and underpaid wages. Austin's recent wins include:

- Obtaining \$29 million in settlements as co-lead counsel in two pioneering cases against Experian arising out of the agency's reporting of delinquent loan accounts, resulting in one of the largest recoveries in history under the Fair Credit Reporting Act
- Co-lead counsel in a \$17.5 million settlement against Kimberly-Clark relating to the sale of contaminated flushable wipes products

Austin is currently representing travel nurses and other healthcare workers who were subject to "take-it-or-leave-it" pay-rate reductions in the middle of their contracts.

**Sexual Abuse Liability.** Austin advocates for victims of sexual abuse in civil cases against their perpetrators and other negligent parties. He respects the sensitivity of these cases by working with local counseling centers and adopting a trauma-informed approach to his legal representation. Austin's recent results include:

- \$8.2 million verdict for sexual assault victim who sued assailant for civil assault and battery
- \$1.5 million settlement in nursing home resident sexual assault case
- Confidential settlement reached against ridesharing giant Uber after female rider was sexually assaulted by driver with criminal background
- Confidential settlements for underage female employee who was sexually assaulted by manager on premises and hospitality worker who was frequently abused by customers at work

Before joining Stueve Siegel Hanson in 2013, Austin was in private practice in St. Louis, where he primarily defended class action cases. He credits this experience with helping him understand how defense lawyers will approach a case – and helping him craft litigation strategies that secure a courtroom advantage.

## EDUCATION

### Washington University School of Law in St. Louis, J.D.

- Recipient of Mary Collier Hitchcock Prize, awarded to one student annually for outstanding legal writing
- CALI Award for Excellence in Legal Practice II: Advocacy
- Law Review: Washington University Journal of Law & Policy, Associate Editor

**University of Mississippi, B.A.**

Political Science, *summa cum laude*

- Honors: Phi Beta Kappa; Phi Kappa Phi

**HONORS & RECOGNITIONS**

Best Lawyers in America: Commercial Litigation and Personal Injury Litigation: Plaintiffs (2025)

The National Law Journal Elite Trial Lawyers Awards "Rising Star of the Plaintiff Bar" (2023)

Law360 "Rising Star" in Cybersecurity and Privacy Law (2019)

Law360 Cybersecurity & Privacy Group of the Year (2020)

Super Lawyers Missouri & Kansas "Rising Star" in Class Action Litigation (2015-2024)

Missouri Lawyers Weekly "Top 5 Judgments or Bench Awards" (2019)

Missouri Lawyers Weekly "Up & Coming Lawyer" (2016)

**COMMUNITY & PROFESSIONAL**

In addition to being a member of numerous professional organizations, Austin represents military veterans pro bono in a variety of matters through the Military Matters program and works with underprivileged students through the Lawyers Encouraging Academic Performance (LEAP) for the Operation Breakthrough program in Kansas City. Austin is an officer in the Federal Courts Advocates section of the Kansas City Metropolitan Bar Association and serves as a member of the Sedona Conference Working Groups on Data Security and Privacy Liability.



# KASEY YOUNGENTOB

## ATTORNEY



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Kasey Youngentob brings legal acumen and litigation experience built from working with both the judiciary and the defense bar to successfully resolve disputes on behalf of individual and commercial clients.

Before joining the firm, Kasey served as a clerk for the Hon. Gregory F. Van Tatenhove at the U.S. District Court for the Eastern District of Kentucky; and the Hon. Eugene E. Siler, Jr. at the U.S. Court of Appeals for the Sixth Circuit. Kasey credits these positions, and his internship for Kansas Supreme Court Justice Eric S. Rosen while in law school, with providing unparalleled exposure to a wide variety of matters and valuable perspective into the federal and state court systems.

In between his clerkships, Kasey worked as an associate for a regional law firm in Topeka, Kansas, where he sharpened his writing skills and gained experience guiding clients through the legal process. He also served as an associate at Skadden, Aps, Slate, Meagher & Flom LLP.

Now at Stueve Siegel Hanson, Kasey applies his understanding of courtroom procedure and defense strategy to effectively advocate for his client's objectives, address the matter's greater implications at stake – and ultimately secure the best possible resolution.

Outside of his practice, Kasey is an avid traveler, literary fanatic, and Creole cuisine enthusiast.

### EDUCATION

#### Vanderbilt University Law School

J.D., 2017

- Honors: Dean's List, Dean's Scholarship
- Scholastic Excellence Award: Informational Privacy Law
- Vanderbilt Law Review Articles Editor

#### Tulane University

B.S., Psychology and Political Science, *cum laude*

- Honors: Honors College, Dean's List, Leadership Scholarship





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